

Monsanto

157138

NOTE:
Attachment to have
been sent w/memo
GAG to TNC, et al of
9/21/84
3808 Proj. Prog. Mtg.

FROM
(NAME - LOCATION - PHONE) A. J. Quick (2271) W.G.K. Plant

DATE September 18, 1984

cc: T. Carrico
W. Smull
K. Storms
N. Sullivan

SUBJECT DISPOSAL PROCEDURE
EXCAVATION DIRT

REFERENCE

TO: R. Nelson

Attached is a dirt sampling/disposal procedure that you should follow relative to dirt excavated as a result of the upcoming south trunk sewer project. A similar procedure will be integrated into the Operations Manual in the near future.

The procedure relies on our best available knowledge of the history of the areas to be excavated. Areas with a history of similar potential soil contaminants are grouped together geographically. For the purposes of the south trunk sewer job, this means that the dirt excavated from a given group of similar areas should constitute a single dirt pile and will be disposed of as a single waste. Care should be taken to avoid co-mingling of different waste piles. Location of the waste piles within the plant is a decision that should be made by appropriate plant management.

Please call me with any questions.

A. J. Quick
A. J. Quick

AJQ/jc
Attachment

L.V. Bumbicka - 1740

W6K 4084862

DIRT DISPOSAL PROCEDURE SOUTH TRUNK SEWER PROJECT-WGK

I. PURPOSE

The purpose of this procedure is to provide a guideline for the handling, storage, and disposal of suspected contaminated dirt excavated during the south trunk sewer project at the W. G. Krummrich Plant. Methods of operations are outlined consistent with environmental regulations and good environmental practice.

II. POLICY

The project plant representative shall use all resources available to insure the classification, and subsequent proper disposal, of excavated dirt as hazardous, non-hazardous but non-sanitary, or sanitary waste consistent with environmental regulations and plant safety policies.

III. PROCEDURE

A. Pre-Excavation Activities

1. An analysis of the history of the area to be excavated will be made with special attention to potential soil contamination that may have resulted from previous plant operations.
2. Core samples of the area to be excavated will be extracted to the expected depth of excavation and analyzed by the plant laboratory or a contract laboratory approved by the plant laboratory. The analysis should quantify to the extent possible all organic contaminants present and any other contaminants that may reasonably be expected due to past practices in the immediate area.
3. Based on the historical analysis and the core sample results the plant representative will divide the area to be excavated into discreet groups of subareas with similar contamination. Dirt removed from similar areas is to be placed in discreet piles. This constitutes the dirt removal strategy.
4. The plant representative shall contact the plant industrial hygiene group to obtain guidance prior to excavation on proper protective equipment required and other safety considerations.
5. The plant representative will contact potentially affected operating departments supervision prior to excavation to make them aware of the planned activities in their respective areas. Department supervision and the plant representative will maintain close contact to insure the safe and environmentally acceptable completion of the excavation.

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6. The Environmental Group will apply for the necessary permits required for the proper disposal of the contaminated dirt. Preferably this should be initiated prior to excavation so as to minimize dirt pile storage time, providing the information available is deemed reliable and sufficient for permitting purposes.
7. The plant representative will obtain appropriate approvals for siting areas in the plant for the temporary storage of excavated dirt.
8. The plant representative will insure that contract or plant personnel to be involved in the excavation are knowledgeable of all safety and environmental concerns as well as the strategy for dirt removal.

B. Excavation Activities

1. All plant safety procedures and the strategy developed for dirt removal shall be followed during excavation.
2. Key safety concerns include:
 1. Monitoring the excavation area for flammable vapors.
 2. Staying alert for unexpected soil contaminants that may adversely affect personnel health or safety. Plant representative to follow guidelines established by the industrial hygiene group relative to this situation. Plant representative to stop excavation and immediately notify both the Safety and Environmental groups should significant unexpected contamination be detected.
 3. The discreet dirt piles generated during excavation consistent with the dirt removal strategy should be physically separated sufficiently to prevent co-mingling, using good judgement. The dirt removal should be piled in the pre-designated areas.
 4. Care must be taken to avoid disruption of ongoing plant operations. Unexpected impacts to operations will be reported immediately to affected department supervision. Any unexpected environment impacts will be reported immediately to the Environmental Group.

C. Post Excavation Activities

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1. Dirt removal equipment should be decontaminated as appropriate.
2. Upon suspicion of unexpected contamination the respective dirt pile will be resampled by the Environmental Group,

III. C. 2. (continued)

who will obtain disposal permit modifications as appropriate based on the analysis.

3. Only clean, uncontaminated dirt should be utilized as fill following excavation.
4. Dirt piles will be sent out for disposal to only disposal locations specified by the Environmental Group. Only appropriately licensed special waste haulers will be used to haul non-sanitary dirt per Illinois Waste Regulations.
5. Shipments of non-sanitary dirt must be accompanied by a waste manifest developed by the Shipping Department.

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